

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

November 22, 2023

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs Executive Committees ("PECs") and counsel for the *Ashton* Plaintiffs write, to reply to Saudi Arabia's opposition (ECF No. 9446) to Plaintiffs' modest extension request (ECF No. 9445).

Saudi Arabia acknowledges that the filing by Plaintiffs of consolidated opposition papers would be preferable, but it unreasonably opposes a modest extension for Plaintiffs to coordinate such a joint filing. Saudi Arabia's opposition ignores the complexities involved in coordinating among numerous law firms representing different clients. In the interests of justice and efficiency, Plaintiffs respectfully submit that their request for a brief extension should be granted.

With respect to Saudi Arabia's request for a modification of the page limits for its brief, the Court already considered this very issue and set page limits, including in the event Plaintiffs filed a consolidated brief. Plaintiffs' request for a modest extension of time provides no rationale for revisiting that ruling; if anything, the filing of a consolidated opposition by Plaintiffs would be grounds to shorten Saudi Arabia's reply. Plaintiffs therefore oppose Saudi Arabia's request.

Despite the foregoing, Plaintiffs sought to bridge the gap between the parties by offering a compromise proposal, under which Plaintiffs would agree to a 75-page limit for Saudi Arabia's reply, provided Saudi Arabia agreed to Plaintiffs' extension request and a 30-page limit for Plaintiffs' sur-reply. Saudi Arabia rejected that reasonable compromise.

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Sean P. Carter

By: /s/ Robert T. Haeefe

The Honorable Sarah Netburn  
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Page 2

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*On behalf of the Ashton Plaintiffs*

cc: The Honorable George B. Daniels, via ECF  
All Counsel of Record via ECF